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Board of Vocational Nursing
and Psychiatric Technicians

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BEFORE THE
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. PT-2009-1625

**WILLIAM E. DEON, AKA DEON
WILLIAM**
25152 19th Street
San Bernardino, CA 92404
Psychiatric Technician License No. PT
21673

A C C U S A T I O N

Respondent.

Complainant alleges:

PARTIES

1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this Accusation solely in her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians, Department of Consumer Affairs.

2. On or about April 14, 1982, the Board of Vocational Nursing and Psychiatric Technicians issued Psychiatric Technician License Number PT 21673 to William E. Deon, aka Deon William (Respondent). The Psychiatric Technician License was in full force and effect at all times relevant to the charges brought herein and will expire on June 30, 2012, unless renewed. On or about November 17, 2010, Respondent was prohibited, as a term of his criminal probation, from practicing or attempting to practice as a psychiatric technician until any disciplinary action filed by the Board of Vocational Nursing and Psychiatric Technicians is final.

1 **JURISDICTION**

2 3. This Accusation is brought before the Board of Vocational Nursing and Psychiatric
3 Technicians (Board), Department of Consumer Affairs, under the authority of the following laws.
4 All section references are to the Business and Professions Code unless otherwise indicated.

5 **STATUTORY PROVISIONS**

6 4. Section 4520 of the Business and Professions Code (Code) provides, in pertinent part,
7 that the Board may discipline any licensed psychiatric technician for any reason provided in
8 Article 3 (commencing with section 4520) of the Psychiatric Technicians Law (Code § 4500, et.
9 seq.)

10 5. Section 118(b) of the Code provides, in pertinent part, that the expiration of a license
11 shall not deprive the Board jurisdiction to proceed with a disciplinary action during the period
12 within which the license may be renewed, restored, reissued or reinstated. Under section 4545 of
13 the Code, the Bureau may renew an expired license at any time within four years after the
14 expiration.

15 6. Section 4521 of the Code states:

16 "The board may suspend or revoke a license issued under this chapter [the Psychiatric
17 Technicians Law (Bus. & Prof Code, 4500, et seq.)] for any of the following reasons:

18 "

19 "(f) Conviction of any offense substantially related to the qualifications, functions, and
20 duties of a psychiatric technician, in which event the record of the conviction shall be conclusive
21 evidence of the conviction. The Board may inquire into the circumstances surrounding the
22 commission of the crime in order to fix the degree of discipline.

23 "

24 "(m) The commission of any act punishable as a sexually related crime, if that act is
25 substantially related to the duties and functions of the licensee."

26 7. Section 490 of the Code provides, in pertinent part, that the Board may suspend or
27 revoke a license when it finds that the licensee has been convicted of a crime substantially related
28 to the qualifications, functions, or duties of a licensed psychiatric technician.

1 **COST RECOVERY**

2 8. Section 125.3 of the Code provides, in pertinent part, that a Board may request the
3 administrative law judge to direct a licensee found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case.

6 **FIRST CAUSE FOR DISCIPLINE**

7 **(Conviction of Substantially Related Crime)**

8 9. Respondent is subject to disciplinary action pursuant to sections 490 and 4521,
9 subdivision (f), in that Respondent was convicted of a crime substantially related to the
10 qualifications, functions, and duties of a licensed psychiatric technician. The circumstances are
11 as follows:

12 10. On or about October 6, 2010, after pleading guilty, Respondent was convicted of one
13 felony count of violating Penal Code section 311.11, subdivision (a), [possession or control of
14 child pornography] in the criminal proceeding entitled *The People of the State of California v.*
15 *William Deon* (Super. Ct. San Bernardino County, 2010, No. FSB903166). Respondent was
16 placed on 3 years supervised probation with terms and conditions and ordered to serve 120 days
17 in a San Bernardino County Jail facility.

18 11. The underlying factual circumstances of the conviction are as follows: In March of
19 2009, Respondent gave a computer to his friend and told the friend that there may be some
20 pornography on the computer. Upon turning on the computer, Respondent's friend opened a file
21 containing images of small children engaged in sex acts with adults. Deputy Loftis of the San
22 Bernardino Sheriff's Department then searched the computer files and saw images of children
23 involved in sexual contact with adults. The children ranged in age from a few months to a few
24 years old.

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1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Commission of Act Punishable as a Sexually Related Crime)**

3 12. Respondent is subject to disciplinary action pursuant to section 4521, subdivision
4 (m), in that Respondent committed an act punishable as a sexually related crime which was
5 substantially related to the duties and functions of a licensed psychiatric technician. Complainant
6 refers to and incorporates all the allegations contained in paragraphs 9-11, as though set forth
7 fully.

8 **PRAYER**


9 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
10 and that following the hearing, the Board of Vocational Nursing and Psychiatric Technicians
11 issue a decision:

12 1. Revoking or suspending Psychiatric Technician License Number PT 21673, issued to
13 William E. Deon, aka Deon William;

14 2. Ordering William E. Deon to pay the Board of Vocational Nursing and Psychiatric
15 Technicians the reasonable costs of the investigation and enforcement of this case, pursuant to
16 Business and Professions Code section 125.3; and

17 3. Taking such other and further action as deemed necessary and proper.
18

19
20 DATED: December 10, 2010

21 
22 TERESA BELLO-JONES, J.D., M.S.N., R.N.
23 Executive Officer
24 Board of Vocational Nursing and Psychiatric Technicians
Department of Consumer Affairs
State of California
Complainant

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